

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

THOMAS M. FINNERAN,

Defendant.

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Criminal No. 05-10140-RGS

**Motion for Enlargement of Time to Respond to**  
**Globe Newspaper's Motion to Intervene**  
**And to Vacate Protective Order**

The United States of America, by and through Assistant United States Attorney John T. McNeil, respectfully submits this motion for an enlargement of time – to August 26, 2005 – to respond to the Globe Newspaper, Inc.'s and the Associated Press's motion to intervene and to vacate or modify the Court's protective order dated July 13, 2005 (Doc. No. 13,14,15). As reason therefore, the government states that the instant motion raises novel and complex issues, and undersigned counsel will be on vacation from August 5, 2005 through August 14, 2005, and out of the District on a work matter from August 16, 2005 until August 19, 2005. Counsel for the Globe and the Associated Press assents to this motion.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

Date: August 1, 2005

By: /s/John T. McNeil  
JOHN T. MCNEIL  
Assistant U.S. Attorney